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March 7, 2024

VIA ECF

Honorable Dale E. Ho
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED. The parties shall meet before the Court on **March 25, 2024, at 10:30 a.m. (E.T.)**. The meeting information remains the same; the parties are directed to dial 646-453-4442, enter the meeting code 598676493, and press pound (#). **SO ORDERED.**

The Clerk of Court is respectfully requested to terminate ECF No. 38.



Dale E. Ho

United States District Judge

Dated: March 7, 2024

New York, New York

Re: Batra v. Experian Information Solutions, Inc., No. 1:23-cv-06408-DEH, Letter Motion to Adjourn Conference on Motion for Protective Order

Dear Judge Ho:

I write on behalf of Experian Information Solutions, Inc. (“Experian”) pursuant to Your Honor’s Individual Rule 2(e) to move for an adjournment of the conference scheduled for March 14, 2024. Counsel for the parties have met and conferred and agree on this request.

On March 5, 2024, Your Honor granted Experian’s request for a Rule 37.2 conference regarding a motion for protective order on eight of Plaintiff’s 57 noticed topics for the 30(b)(6) deposition of Experian’s corporate representative, scheduling a conference for March 14, 2024. Dkt. 37. Due to prior travel commitments, Experian is unavailable for a conference on the date of March 14, 2024. Per Your Honor’s Individual Rule 2(e)(v), the parties propose the following dates as alternative dates on which to hold the Rule 37.2 conference:

- March 20, 2024 (afternoon)
- March 25, 2024 (entire day)
- March 26, 2024 (afternoon)
- March 27, 2024 (morning)

The parties are unfortunately unable to offer full-day availability to Your Honor for the dates of March 20, March 26, and March 27 due to an initial pretrial conference in *Webber v. Sunrise Services, Inc.*, No. 2:23-cv-05911 (E.D.N.Y.) (March 20); a final pretrial conference in *Potapova v. Toyota Motor Credit Corporation*, No. 1:23-cv-00571-JMF (S.D.N.Y.) (March 26); and previously scheduled out-of-town travel on March 27. This request for adjournment does

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not impact any other dates in the so-ordered case management plan. This is the first request for adjournment of the Rule 37.2 conference. We thank the Court for its attention to this matter.

Respectfully submitted,

Maxwell C. Dvorak

*Counsel for Defendant
Experian Information Solutions, Inc.*

cc: All counsel of record (via ECF)